



Rebuttal

DEPARTMENT OF
UTILITIES

CITY OF SACRAMENTO
CALIFORNIA

2812 Meadowview Road
Sacramento, CA 95832

SOLID WASTE DIVISION

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February 11, 2008

John Moody
Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, # 200
Rancho Cordova, CA 95670

Re: Dellar Property and Pending Corrective Action Order Schedule

Dear Mr. Moody:

In our last communication, the City showed a work plan being completed over two building seasons starting from when the Regional Waster Board approved the City's proposed closure plan. This schedule assumed approval of our proposal to fill and grade the property to drain, and included the property in the existing monitoring system for the 28th Street Landfill. To date we have not received the Corrective Action Order and therefore, have not started any engineering design work or other preliminary steps leading to construction work to close site as proposed. We have stock piled approximately 40,000 cyds of soil to be used to fill and grade the property.

The schedule was developed prior to learning the City is projecting a \$55 million dollar short fall in the budget. Due to this change in the City's budget, we request to meet with the Water Board staff to discuss a revised schedule for completing the project as proposed to date. The purpose of the meeting is to discuss extending the schedule so actual work beyond engineering and design does not proceed for three years. This will allow the City to set aside the funds needed to complete the project.

The City will continue to monitor the property with the existing ground water and gas monitoring system now in place for the 28th Street Landfill, and respond to any ground water issues identified through the ground water lab results and methane gas probes.

As stated in previous communications, the monitoring system for the 28th Street Landfill includes the ground water and gas migration that may originate from the Dellar Property. To date, no offsite ground water contamination originating from the Dellar Property or the 28th Street Landfill has been detected. The perimeter monitoring system shows the gas collection system is containing the methane gas to the landfill property and there is no detection of an



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offsite ground water plume has been detected in the ground water monitoring system. Therefore, it is the City's position the requested three-years to start the actual work to grade the Dellar property to drain poses no environmental health and safety to the public.

We look forward to favorable response and the opportunity to discuss this issue.

Sincerely,

Edison Hicks
Integrated Waste General Manager

cc: Gary Reents, Director, Dept. of Utilities
Dave Brent, Manager, Engineering Services
Bill Busath, Senior Supervising Engineer
Jerry Hicks, Senior Deputy City Attorney
Marian Fahey, Director, Dept. of Finance